

**LEVI & KORSINSKY, LLP**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

DONALD RAMSEY, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

COINBASE GLOBAL, INC., BRIAN  
ARMSTRONG, ALESIA J. HAAS,  
JENNIFER N. JONES, SUROJIT  
CHATTERJEE, PAUL GREWAL, MARC  
L. ANDREESSEN, FREDERICK  
ERNEST EHRSAM III, KATHRYN  
HAUN, KELLY KRAMER, GOKUL  
RAJARAM, FRED WILSON, AH  
CAPITAL MANAGEMENT LLC,  
PARADIGM FUND LP, RIBBIT  
MANAGEMENT COMPANY, LLC,  
TIGER GLOBAL MANAGEMENT, LLC,  
UNION SQUARE VENTURES, LLC, and  
VISERION INVESTMENT PTE LTD.,

Defendants.

Case No.: 3:21-cv-05634-VC

**SUPPLEMENTAL DECLARATION OF  
HSIU-MEI YU IN FURTHER SUPPORT  
OF MOTION FOR APPOINTMENT AS  
LEAD PLAINTIFF**

Date: October 28, 2021  
Time: 2:00 p.m.  
Courtroom: 4-17th Floor  
Judge: Hon. Vince Chhabria

GABBY KLEIN, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

COINBASE GLOBAL, INC., BRIAN  
ARMSTRONG, ALESIA J. HAAS,  
JENNIFER N. JONES, SUROJIT  
CHATTERJEE, PAUL GREWAL, MARC  
L. ANDREESSEN, FREDERICK  
ERNEST EHRSAM III, KATHRYN  
HAUN, KELLY KRAMER, GOKUL  
RAJARAM, and FRED WILSON,

Defendants.

Case No.: 4:21-cv-06049-YGR

MATTHEW CATTERLIN, Individually  
and on Behalf of All Others Similarly  
Situated,

Plaintiff,

v.

COINBASE GLOBAL, INC., BRIAN  
ARMSTRONG, SUROJIT CHATTERJEE,  
PAUL GREWAL, ALESIA HAAS, MARC  
ANDREESSEN, FREDERICK ERNEST  
EHRSAM III, KATHRYN HAUN,  
KELLY KRAMER, GOKUL RAJARAM,  
FRED WILSON, AH CAPITAL, LLC,  
PARADIGM FUND LP, RIBBIT  
MANAGEMENT COMPANY, LLC,  
TIGER GLOBAL MANAGEMENT, LLC,  
UNION SQUARE VENTURES, LLC, and  
VISERION INVESTMENT PTE LTD.,

Defendants.

Case No.: 4:21-cv-06149-YGR

1 I, Hsiu-Mei Yu, pursuant to 28 U.S.C. § 1746, declare as follow:

2 1. I reaffirm the statements made in my declaration filed in support of my motion and  
3 respectfully submit this Supplemental Declaration in further support of my motion for appointment as  
4 Lead Plaintiff in the above-captioned securities class actions (the “Actions”) against Coinbase Global,  
5 Inc. (“Coinbase” or the “Company”) and the other above-captioned defendants. I have personal  
6 knowledge about the facts stated herein and could competently testify to them if called to do so.

7 2. On September 13, 2021, I learned that Levi & Korsinsky, LLP (“Levi & Korsinsky”) was  
8 investigating potential claims against Coinbase, certain members of Coinbase’s management, and  
9 the other captioned defendants. I contacted Levi & Korsinsky that same day to consult the firm about  
10 its investigation and evaluate my potential claims against Coinbase and any other defendants.

11 3. On September 13, 2021, I also learned that WeissLaw LLP (“WeissLaw”) was  
12 investigating a lawsuit against Coinbase. I was not aware that this was the same lawsuit being  
13 investigated by Levi & Korsinsky and mistakenly believed it was a separate matter. Given my  
14 substantial loss, I contacted WeissLaw about its investigation.

15 4. On September 14, 2021, I was contacted by Melissa Muller, an attorney at Levi &  
16 Korsinsky, about my interest in the Coinbase lawsuit. She and I discussed, among other things, the  
17 claims being pursued against Coinbase, my transactions in Coinbase stock and the duties and  
18 responsibilities of a lead plaintiff. I also negotiated, on behalf of myself and the Class I seek to  
19 represent, a favorable retainer agreement containing a cap on any fee that Levi & Korsinsky may collect  
20 (subject to the Court’s approval) in the event of a successful recovery.

21 5. On September 17, 2021, after becoming satisfied that Levi & Korsinsky’s significant  
22 experience in securities cases would benefit the class, I decided to retain Levi & Korsinsky to represent  
23 me and authorized Levi & Korsinsky to file a motion for lead plaintiff on my behalf in the Actions.

24 6. On September 19, 2021, Levi & Korsinsky sent me a copy of a complaint filed against  
25 Coinbase to review. I then signed a client retainer, certification, and declaration in support of my lead  
26 plaintiff motion with Levi & Korsinsky.

27 7. After I initially contacted WeissLaw, the firm emailed me a copy of the Coinbase class  
28 action complaint that their firm had filed. The complaint sent to me by WeissLaw was not the same

1 complaint I received from Levi & Korsinsky. Believing that the action WeissLaw filed was separate  
2 from the action Levi & Korsinsky was pursuing, I signed a certification with WeissLaw to increase my  
3 chances of recouping my losses.

4 8. On September 21, 2021, my counsel at Levi & Korsinsky alerted me that WeissLaw had  
5 filed a motion for lead plaintiff on my behalf and on behalf of another individual in the Actions. I was  
6 previously unaware that WeissLaw filed a motion for lead plaintiff on my behalf in the Actions or that  
7 WeissLaw filed the motion on behalf of another individual in addition to myself. It was at that point I  
8 understood that Levi & Korsinsky and WeissLaw were pursuing the same lawsuit.

9 9. On September 21, 2021, I instructed WeissLaw to immediately withdraw the motion  
10 they filed on my behalf and that I wished to only be represented by Levi & Korsinsky.

11 10. I am committed to retaining Levi & Korsinsky as counsel in this matter and am  
12 committed to pursuing this case as a lead plaintiff on behalf of a Class of similarly situated investors.

13 11. Prior to the filing of the lead plaintiff motions on September 20, 2021, I understood that:

- 14 a. I would be entrusted with the prosecution of these actions on behalf  
15 of not only myself, but on behalf of other class members whose  
16 interests are at stake;
- 17 b. the lead plaintiff is to take an active role in the prosecution of the  
18 case, including supervising the conduct of counsel to ensure that the  
19 progress of the case is handled in an efficient manner, and monitoring  
20 the status and progress of this action;
- 21 c. the lead plaintiff role includes evaluating the strengths and  
22 weaknesses of the case and the prospects for the resolution for this  
23 matter, with the assistance of counsel; and
- 24 d. it is my responsibility to direct counsel with respect to this litigation  
25 after receiving the benefit of counsel's advice.

26 12. I have reviewed Levi & Korsinsky's firm website and the firm resume and believe it to  
27 be highly experienced, capable counsel in prosecuting securities class action lawsuits such as this.  
28 Accordingly, I request the Court appoint Levi & Korsinsky as lead counsel to represent my interest, as

1 well as those of the putative Class.

2 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United  
3 States of America that the foregoing is true and correct.

4  
5 Executed On: 9/30/2021

6  
7 Signed:   
8 02B0B3DDD48A4CA...

9  
10 Name: Hsiu-Mei Yu